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In the Matter of:

: UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

Rachel S. Brady : HONORABLE JOHN K. SHERWOOD

: CASE NO. 19-13161

Debtor : CHAPTER 13

**OBJECTION TO APPLICATION FOR EARLY TERMINATION OF LOSS
MITIGATION PERIOD**

I, Russell L. Low, being of full age, hereby certify the following:

1. I represent the above-mentioned debtor, Rachel S. Brady in this current bankruptcy proceeding.
2. On February 24, 2020 an Order granting the Application for Extension of Loss Mitigation was entered.
3. On May 13, 2020 an Application for Early Termination of Loss Mitigation Period was filed by counsel for SN Servicing Corporation because the debtor was denied a loan modification based on the fact that a complete loan modification package was not submitted.
4. The debtor was delayed in submitting the package due to the stress that COVID-19 has put onto the debtor and her family.
5. The documents have been submitted to SN Servicing's counsel via debtor's counsel and SN Servicing's counsel has advised that the documentation has been forwarded to SN Servicing for review.

6. Furthermore, SN Servicing also requested that the debtor must purchase property/hazard insurance and the debtor will be doing so in a timely manner to be in compliance.
7. Based on the aforementioned information, I am respectfully requesting on behalf of the debtor the opportunity to resolve SN Servicing's Application for Early Termination of Loss Mitigation.

Dated: May 20, 2020

/s/ Russell L. Low, Esq.
RUSSELL L. LOW, ESQ.
Attorney for Debtor